STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF HOMELAND TOWERS, LLC AND NEW CINGULAR WIRELESS PCS, LLC d/b/a AT&T FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE, AND **OPERATION OF A TELECOMMUNICATIONS** FACILITY AT ONE OF TWO SITES IN THE TOWN OF KENT, CONNECTICUT

DOCKET NO. 488

April 24, 2020

APPLICANT HOMELAND TOWERS LLC INTERROGATORIES TO INTERVENOR BALD HILL ROAD NEIGHBORS

- 01. Regarding the photographs included in Exhibit 1 of the Bald Hill Road Neighbors April 17, 2020 Interrogatories, for each photograph, provide the date(s) and approximate time the photograph was taken and the name of the person(s) that was on the property that took the photograph and/or assisted with the photographs.
- Q.2 Provide the evidence demonstrating that the individuals identified in A1 who were on the Site B property to take the photographs in Exhibit 1 of the Bald Hill Road Neighbors April 17, 2020 Interrogatories had authorization from the Site A property owner to enter the property and take the photographs.
- Q.3 Provide information or details regarding any materials or other items that were deposited or left on the Site A property when it was accessed for the photographs in Exhibit 1 of the Bald Hill Road Neighbors April 17, 2020 Interrogatories.

CERTIFICATION OF SERVICE

I hereby certify that on this day the foregoing was sent electronically to attorneys Anthony F. DiPentima and Michael D. Rybak, Jr. representing the Bald Hill Road Neighbors Intervenor and the Connecticut Siting Council in accordance with Siting Council directives to waive hard copy filing requirements to prevent the spread of the corona virus and to:

Keith R. Ainsworth, Esq. Law Offices of Keith R. Ainsworth, Esq. 51 Elm Street, Suite 201 New Haven, CT 06510-2049 (203) 435-2014 keithrainsworth@live.com

April 24, 2020

Lucie Chrocchio

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cc: Raymond Vergati, <u>rv@homelandtowers.us</u> Manuel Vicente, <u>mv@homelandtowers.us</u> Brian Leyden, <u>bl5326@att.com</u> Harry Carey, <u>HC3635@att.com</u>